

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: RICHARD ALLEN HAHN	:	CHAPTER 13
Debtor(s)	:	
	:	
JACK N. ZAHAROPOULOS	:	
STANDING CHAPTER 13 TRUSTEE	:	
Movant	:	
	:	
vs.	:	
	:	
RICHARD ALLEN HAHN	:	
Respondent(s)	:	CASE NO. 4-19-bk-02279

TRUSTEE'S MOTION TO DISMISS FOR FAILURE  
TO MAKE PLAN PAYMENTS

AND NOW, this 26th day of July, 2021, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania, and respectfully represents the following:

- 1) Debtor's Chapter 13 Bankruptcy Petition was filed on May 25, 2019.
- 2) Debtor's Chapter 13 Plan was filed on May 25, 2019.
- 3) The debtor made a payment to the Chapter 13 Trustee by personal check on February 22, 2021 in the amount of \$280.00
- 4) The debtor's personal check was returned to the Trustee for insufficient funds.
- 5) The Trustee, by correspondence dated February 25, 2021, advised the debtor that all future payments must be by certified check or money order.
- 6) The debtor made a payment on July 12, 2021, by a personal check in the amount of \$840.00 which payment was dishonored by the bank.

7) Trustee represents and alleges that debtors are not making payments in good faith and is further complicating the administrative process of the Chapter 13 by issuing personal checks for which the payment is being dishonored.

WHEREFORE, your Trustee respectfully requests Your Honorable Court to dismiss debtor's Chapter 13 Petition.

Respectfully submitted,

/s/Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717)566-6097

CERTIFICATE OF SERVICE

AND NOW, this 26<sup>th</sup> day of July, 2021 I hereby certify that I have served the within Motion by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Jason Provinzano, Esquire  
16 W. Northampton Street  
Wilkes Barre, PA 18701

/s/Deborah A. Behney  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: RICHARD ALLEN HAHN a/k/a : CHAPTER 13  
RICHARD HAHN a/k/a RICHARD :  
A. HAHN :  
Debtor :  
: CASE NO. 4-19-bk-02279-HWV  
: MOTION TO DISMISS

NOTICE TO PARTIES

NOTICE IS HEREBY GIVEN that Jack N. Zaharopoulos, Standing Chapter 13 Trustee for the Middle District of Pennsylvania has filed a Motion to Dismiss for Failure to Make Payments.

YOU ARE HEREBY NOTICED that a hearing has been scheduled on this matter for:

United States Bankruptcy Court US Courthouse, 4 <sup>th</sup> Floor Courtroom #1 240 West Third Street Williamsport, PA	Date: August 20, 2021  Time: 10:00 AM

Any objection/response to the above referenced matter must be filed and served on or before:  
**August 9, 2021.**

If service was properly made and Respondent(s) fail to file an objection/response by the above specified date, the Court **may** determine after review of the Motion that no hearing is required and grant the relief requested.

If a default order has not been signed and entered, the parties or their counsel are required to appear in Court at the hearing on the above date and time.

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
Phone: (717) 566-6097  
Fax: (717) 566-8313  
E-Mail: [info@pamd13trustee.com](mailto:info@pamd13trustee.com)

Dated: July 26, 2021